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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JASON EDWARD THOMAS CARDIFF,  
  
Defendant.

No. 5:23-CR-00021-JGB

**OPPOSITION TO JASON CARDIFF'S EX  
PARTE APPLICATION FOR AN ORDER  
PERMITTING INTERNATIONAL TRAVEL  
AND RETURNING HIS PASSPORT**

Plaintiff United States of America, by and through its counsel  
of record, the Consumer Protection Branch of the Department of  
Justice and Trial Attorney Manu J. Sebastian, and the United States  
Attorney for the Central District of California and Assistant United

1 States Attorney Valerie L. Makarewicz, oppose the *ex parte*  
2 application for an order permitting international travel and return  
3 of defendant's passport made by defendant, Jason Edward Thomas  
4 Cardiff, for the same reasons as identified in its previous  
5 oppositions. [Dkt. # 89-90, 104].

6 In addition, after the Court indicated at the hearing on October  
7 21, 2024, that it was inclined to deny Defendant's Motion to Suppress  
8 and Motion to Dismiss Count 2, defendant now faces the reality that  
9 he will be incarcerated for a mandatory minimum of two years if  
10 convicted of aggravated identity theft in addition to his prison  
11 sentence for the other crimes charged in the Indictment. Importantly,  
12 Defendant's risk of flight has increased as the parties prepare for  
13 the upcoming trial. Moreover, the defendant's recent statements in  
14 both his motions and his declarations further illustrate that he has  
15 not been truthful to the Court. Accordingly, the government requests  
16 the Court deny the defendant's *ex parte* application for an order  
17 permitting international travel and return of defendant's passport.

18 Dated: October 24, 2024

Respectfully submitted,

19 AMANDA N. LISKAMM  
20 Director  
21 Consumer Protection Branch

22 E. MARTIN ESTRADA  
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23 /s/  
24 MANU J. SEBASTIAN  
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26 Attorneys for Plaintiff  
27 United States of America